

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF OKLAHOMA**

- (1) CHILD DOE 1, a minor, by and through parent and next friend, PARENT DOE 1;
- (2) CHILD DOE 2, a minor, by and through parents and next friend, PARENT DOE 2;
- (3) CHILD DOE 3, a minor, by and through parent and next friend, PARENT DOE 3;
- (4) CHILD DOE 4, a minor, by and through parents and next friend, PARENT DOE 4;
- (5) CHILD DOE 5, a minor, by and through parent and next friend, PARENT DOE 5;
- (6) CHILD DOE 6, a minor, by and through parent and next friend, PARENT DOE 6;
- (7) CHILD DOE 7, a minor, by and through parent and next friend, PARENT DOE 7;
- (8) JANE DOE 1;
- (9) JANE DOE 2; and
- (10) CHILD DOES 8-30.

Plaintiffs,

v.

- (1) TULSA COUNTY, ex. rel. JUVENILE BUREAU OF THE TULSA COUNTY DISTRICT COURT;
- (2) BOARD OF COUNTY COMMISSIONERS OF TULSA COUNTY;
- (3) ANTHONY TAYLOR; as former Director of the Juvenile Bureau;
- (4) ALONDO EDWARDS, as Acting Director of the Juvenile Bureau;
- (5) DOUGLAS CURRINGTON, as Superintendent of the Juvenile Bureau;

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- (6) CORTEZ TUNLEY, as former Superintendent of the Juvenile Bureau;
- (7) JONATHAN HINES, former detention officer of the Juvenile Bureau;
- (8) AUSTIN ZENZEN, former detention officer of the Juvenile Bureau;
- (9) DQUAN DOYLE, former detention officer of the Juvenile Bureau, aka "DQ;"
- (10) MANDI LEE RAYMOND, former employee of the Juvenile Bureau;
- (11) CINDY TREADWAY, former employee of the Juvenile Bureau;
- (12) JANE DOE 1, aka "DO Shalonda," current or former detention officer of the Juvenile Bureau;
- (13) JANE DOE 2, aka "DO Kelly," current or former detention officer of the Juvenile Bureau;
- (14) JANE DOE 3, aka "Miss Carrie," current or former detention officer of the Juvenile Bureau;
- (15) JANE DOE 4, aka "Miss Torrie," current or former detention officer of the Juvenile Bureau;
- (16) JOHN DOES 1-10, current and former detention officers of the Juvenile Bureau;
- (17) JANE DOES 5-14, current and former detention officers of the Juvenile Bureau;
- (18) STATE OF OKLAHOMA, ex rel. OFFICE OF JUVENILE AFFAIRS;
- (19) JEFFREY CARTMELL, as Director for the Office of Juvenile Affairs;
- (20) RACHEL HOLT, as former Director for the Office of Juvenile Affairs; and
- (21) BEN BROWN, as General Counsel for the Office of Juvenile Affairs,

## DISCLOSURE STATEMENT

**"PARTY" DEFINED:** Within this form, the terms "party" and "parties" refer to any party, intervenor, or proposed intervenor to this action.

Pursuant to Fed. R. Civ. P. 7.1:

JANE DOE 2

*[enter name of party on the line above]*

who is a (check one) ☒ PLAINTIFF ☐ DEFENDANT ☐ OTHER: \_\_\_\_\_

in this action, makes the following disclosures:

**INSTRUCTIONS:**

1. Determine which part(s) of the form apply:
  - Part I is applicable only in diversity cases and must be completed by all parties.
  - Part II is applicable in all cases and must be completed by all nongovernmental parties that are not natural persons.
2. Check the applicable box or boxes, and fully provide any required information.
3. Attach separate pages as necessary to fully provide required information.

### **PART I**

- ☒ This party is an individual who resides in Tulsa County.
- ☐ This party is a corporation incorporated in \_\_\_\_\_ and with a principal place of business in \_\_\_\_\_.
- ☐ This party is an unincorporated association or another artificial entity, including a limited liability company or limited liability partnership.

If yes, identify the nature of the entity, the members of the entity and the member's state of citizenship. If any member is other than an individual person, the required information identifying ownership interests and citizenship for each sub-member must be provided as well.

- ☐ This party is a trust.

If yes, identify each trustee and each trustee's state of citizenship. If any trustee is other than an individual person, the required information identifying ownership of the non-individual trustee and state of citizenship of each sub-trustee must be provided as well.

### **PART II**

- ☐ This party is publicly held.
- ☐ This party has one or more parent entities.

If yes, identify all parent entities, including grandparent and great-grandparent entities.

☐ This party has one or more subsidiaries.

If yes, identify all subsidiaries.

☐ Ten percent or more of the stock of this party is owned by a publicly held corporation or other publicly held entity.

If yes, identify all such owners.

☐ Another association, firm, partnership, corporation, or other artificial entity related to the party—not already identified through other answers—has a direct financial interest in the outcome of the litigation.

If yes, identify all associations, firms, partnerships, corporations or other artificial entities and the nature of their interest.

☐ This party is a trade association.

If yes, identify all members of the association, their parent entities, and any publicly held companies that own ten percent or more of a member's stock.

☐ This party is a trust.

If yes, identify each trustee, their parent entities, and any publicly held companies that own ten percent or more of a trustee's stock.

**Any additional pertinent information should also be provided on attached page(s).**

**DATED** this 30<sup>th</sup> day of May, 2024.

Signature: /s/ Donald E. Smolen, II

Printed Name: Donald E. Smolen, II

Bar Number: 19944

Firm Name: Smolen | Law, PLLC

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## CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2024 (Date), I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants (names only are sufficient):

I hereby certify that on \_\_\_\_\_ (Date), I served the same document by

☐ U.S. Postal Service

☐ In Person Delivery

☐ Courier Service

☐ E-Mail

on the following, who are not registered participants of the ECF system:

Name(s) and Address(es):

/s/ Donald E. Smolen, II

Signature